

# **EXHIBIT B**

# LOREE & LOREE

Attorneys at Law

Philip J. Loree Jr.

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**Via Email**

Anil K. Arora, Esq.  
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**Re: Geo-Group Communications, Inc. v. Ravi Chopra, 15-cv-1756 (KPF)**

Dear Anil:

We are writing concerning the Jaina tax returns that your clients produced in response to Geo-Group's First Request to produce documents.

Specifically, the Jaina tax returns for 2014 and 2015 do not contain all of the statements or schedules that are required by IRS Forms 1120 and 1125-A. These deficiencies are described in more detail in the chart attached as Ex. A.

As you may recall, Geo-Group Bates stamped the documents your clients produced, since the documents produced to us did not bear Bates numbers. The 2014 returns your clients produced are Bates stamped Shah\_Ds-000253-268. The 2014 tax returns are Bates stamped 000269-286.

Please produce immediately complete copies of the 2014 and 2015 returns containing the missing statements and schedules described in Ex. A.

Thank you in advance for your anticipated cooperation.

Sincerely,



Philip J. Loree Jr.

cc:Mr. Govind Vanjani (by email w/att)  
Humayun Siddiqui, Esq. (by email w/att)  
Philip J. Loree, Esq. (by email w/att)

**EXHIBIT A TO LETTER TO ANIL K. ARORA, ESQ. DATED JANUARY 5, 2017****EXHIBIT A: STATEMENTS AND SCHEDULES MISSING FROM 2014 AND 2015 JAINA TAX RETURNS**

<b>Tax Year</b>	<b>Form</b>	<b>Line</b>	<b>Item</b>	<b>Not Included with Return</b>
2014	1120	26	Other deductions (attach statement)	Statement
2014	1120, Schedule L	6	Other current assets (attach statement)	Statement
2014	1120, Schedule L	14	Other assets (attach statement)	Statement
2014	1120, Schedule L	18	Other current liabilities (attach statement)	Statement
2014	1125-A (Cost of Goods Sold)	4	Additional section 263A costs (attach schedule)	Schedule
2015	1120	26	Other deductions (attach statement)	Statement
2015	1120, Schedule L	6	Other current assets (attach statement)	Statement
2015	1120, Schedule L	14	Other assets (attach statement)	Statement
2015	1120, Schedule L	18	Other current liabilities (attach statement)	Statement